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BEFORE THE

Federal Communications Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

WASHINGTON, D.C. 20554

In the Matter of

Revision of the Commission's)	CC Docket No. 94-102
Rules to Ensure Compatibility)	RM-8143
with Enhanced 911 Emergency)	Further Notice of
Calling Systems)	Proposed Rulemaking

To: The Commission

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COMMENTS
OF
THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.
AND
THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

The International Association of Fire Chiefs, Inc. (IAFC) and the International Municipal Signal Association (IMSA) respectfully submit these Reply Comments in response to the Report and Order and Further Notice of Proposed Rulemaking (Further Notice) released by the Federal Communications Commission (Commission) on July 26, 1996 in the above-captioned proceeding.

I. INTRODUCTORY STATEMENT

IMSA is a non-profit organization dedicated to the development and use of electrical signaling and communications systems in the furtherance of public safety. The members of IMSA include representatives of federal, state, county, city, township, and borough governmental bodies and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest

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organization in the world dedicated to the activities pertaining to electrical engineering, including the Public Safety use of radio technology.

IAFC is a voluntary, professional membership society. Its approximately 9,000 members comprised of senior Fire Service officials are dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior management in the Fire Service.

IAFC and IMSA are recognized as the frequency coordinating committee for the Fire Radio Service and, in conjunction with the National Association of Business and Educational Radio, Inc. (NABER), constitute the recognized coordinating committee for the Special Emergency Radio Service ("SERS"). Moreover, IMSA and IAFC members and their respective public safety agencies operate Public Safety Answering Points (PSAPs) and rely on 911 emergency calling systems for receipt of emergency notifications from the general public. IMSA and IAFC regularly express their views before the Commission on issues affecting the Public Safety and Special Emergency Radio Service.

II. DISCUSSION

IAFC and IMSA support the Commission's on-going efforts to meet the Nation's public safety communications needs. The rules adopted in the Report and Order represent a valuable "first step" in ensuring that 911 and E911 services are as widely available as possible and that these services

take advantage of advances in communications technology.^{1/} The Commission correctly concludes, however, that to spur improvements in the features and delivery of these services, the standards and requirements adopted in the Report and Order must be expanded, as the Commission proposes to do in its Further Notice.

A. The Standards and Requirements Applicable to Location Information Should Be Expanded

The timely receipt of accurate and reliable location information is critical to effective 911 and E911 services. Nonetheless, the complexities associated with locating a mobile caller in emergency situations warrants a phased deployment of automatic location identification (ALI) capability. In its Report and Order the Commission establishes for Phase II implementation a technically feasible "satisfactory initial minimum standard" applicable to covered wireless carriers:

carriers must supply to PSAPs, not later than five years after the effective date of the rules adopted in the Report and Order, information that locates a wireless 911 caller within a radius of 125 meters, using longitude and latitude data, and that provides this degree of accuracy of 67 percent of the 911 calls processed.^{2/}

The Commission's ALI implementation requirements and accuracy standard reflect a record it describes as containing "insufficient information . . . regarding the ability of wireless carriers to implement more stringent

^{1/} Further Notice at para. 133.

^{2/} Report and Order at para. 70; Further Notice at para. 136.

requirements within the short term."^{3/} Given the acknowledged shortcomings of that record, the Commission has made a pragmatic and sensible decision to adopt rules of a "somewhat limited scope" and issue a Further Notice to "focus on the issue of whether the standards and requirements we are adopting today can be expanded."^{4/}

Expanded standards and requirements applicable to location information are imperative if the Commission is to achieve its stated goal of "mak[ing] wireless services as comparable as possible to wireline service in E911 access," a goal that IAFC and IMSA share.^{5/} Clearly, the accelerating pace of technological evolution makes this stated goal achievable. So that this technological change advances both the quality of E911 services and the public interest, however, the Commission must establish more stringent Phase II requirements to be applicable at the end of the initial five-year period.

As the Commission correctly recognizes, more stringent requirements and standards will serve as an incentive to develop improved location information technologies.

^{3/} Further Notice at para. 134, although at para. 139 the Commission notes that one manufacturer, KSI, claims that it is already possible to implement location information technology that can identify a 911 caller's location with a reliability of 90 percent.

^{4/} Further Notice at para. 134. Individual waivers may be appropriate in those exceptional circumstances where deployment of E911 may not be technically or economically feasible. See, Report and Order at para. 84.

^{5/} Report and Order at para. 158.

Although these technologies will enhance the ability of public safety agencies to obtain timely, accurate, and complete information, the benefits associated with these improved technologies will extend beyond E911 services. These efforts are almost certain to develop technologies that, in addition to advancing the quality of 911 services, will be introduced and marketed in the increasingly competitive telecommunications environment where both wireless and wireline carriers jockey for position and customers.^{6/}

B. Requirements Applicable to Non-Code Identification 911 Calls Should Be Expanded

The Commission's Report and Order obligates covered carriers, within one year after the rule's effective date, to process all 911 calls (a) which transmit a Code Identification and (b) which do not transmit a Code Identification but where such processing has been requested by the administrator of the designated PSAP. The Commission should expand this requirement by imposing upon covered carriers the obligation to process all 911 calls, whether or not the call transmits a Code Identification. Such a modification accords with the Commission's stated goal of ensuring that as many 911 calls are processed as feasible.^{7/}

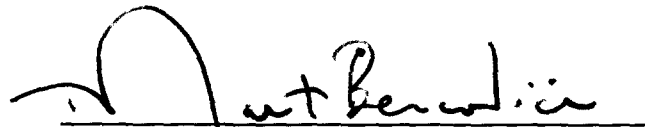
^{6/} See also, Further Notice at para. 153 [Action "to make wireless 911 service as ubiquitous and transparent as possible to the using public . . . should not only improve 911 service but also promote a more universal, dynamic, and competitive mobile radio industry."].

^{7/} Further Notice at para. 149.

The practices of an individual PSAP should not determine which non-code identification 911 calls are processed. As the Commission recognizes, unnecessary customer confusion is likely to result when completion of non-code identification 911 calls depends on the practices of the PSAPs serving a particular area. Such confusion undermines the concept of a nationally standardized emergency calling system. More immediately, in those areas where the PSAP administrator fails to request carrier processing, a class of callers to emergency services will be deprived of the benefits that cellular radio service offers to the safety of the travelling public.

WHEREFORE, THE PREMISES CONSIDERED, the International Municipal Signal Association and the International Association of Fire Chiefs, Inc. respectfully request that the Federal Communications Commission take action consistent with the foregoing.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Martin W. Bercovici", is written over a horizontal line.

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